

THE HONORABLE THOMAS S. ZILLY

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

GLACIER NORTHWEST, INC.,

Plaintiff,

v.

CEMENTAID INTERNATIONAL
MARKETING, LTD.,

Defendant.

Case No. 2:18-cv-00556 TSZ

**GLACIER NORTHWEST, INC.’S
REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF
OPPOSITION TO CEMENTAID
INTERNATIONAL MARKETING,
LTD.’S MOTION TO DISMISS
AMENDED COMPLAINT**

**NOTE ON MOTION CALENDAR:
DECEMBER 14, 2018**

Plaintiff Glacier Northwest, Inc. (“Glacier Northwest”) respectfully requests that this Court take judicial notice, pursuant to Federal Rule of Evidence 201, of the following documents in connection with Glacier Northwest’s Opposition to Cementaid International Marketing, Ltd.’s Motion to Dismiss the Amended Complaint in this matter:

1. Defendant Cementaid International Marketing, Ltd.’s (“Cementaid”) Notice of Appearance as a cross-defendant in the action entitled *Millennium Tower Association v. Mission Street Development LLC, et al.*, Case CGC-17-557830 in the Superior Court of the State of California, County of San Francisco (“Millennium

{18117/052/01823024-1}

JUDICIAL NOTICE ISO OPPOSITION TO MOTION
TO DISMISS
2:18-cv-00556 TSZ

GLACIER NORTHWEST, INC.’S REQUEST FOR
BROWER LAW GROUP

25201 La Paz Road, Suite 202
Laguna Hills, California 92653
Telephone: (949) 668-0825

1 Tower Action”), filed on July 13, 2018, a true and correct copy of which is attached
 2 as Exhibit 6 to this request.

3 2. Cementaid’s Memorandum of Points and Authorities in Support of
 4 Cementaid’s Joinder in YKK AP, Inc.’s Motion to Continue the Trial Date and
 5 Motion to Sever the Non-Foundational Defect Issues in the Millennium Tower
 6 Action, filed on July 16, 2018, a true and correct copy of which is attached as Exhibit
 7 7 to this request.

8 3. Declaration of Jared Schuettenhelm in Support of Cementaid’s Joinder
 9 in YKK AP, Inc.’s Motion to Continue the Trial Date and Motion to Sever the Non-
 10 Foundational Defect Issues in the Millennium Tower Action, filed on July 16, 2018,
 11 a true and correct copy of which is attached as Exhibit 8 to this request.

12 The above-referenced documents are properly the subject of judicial notice
 13 pursuant to Federal Rule of Evidence 201, which provides that a court may take
 14 judicial notice of facts “not subject to reasonable dispute in that it is ... capable of
 15 accurate and ready determination by resort to sources whose accuracy cannot
 16 reasonably be questioned.” Each of the documents referenced here is a pleading
 17 which has been filed by Defendant Cementaid, using the same law firm which is its
 18 counsel in this matter. Moreover, any objection to the declaration of Mr.
 19 Schuettenhelm should be disregarding because, since they are statements made by
 20 counsel for the party, the constitute party admissions, an applicable exception to the
 21 hearsay rule.

22
 23
 24
 25
 26
 27 {18117/052/01823024-1}

JUDICIAL NOTICE ISO OPPOSITION TO MOTION
 TO DISMISS
 2:18-cv-00556 TSZ

GLACIER NORTHWEST, INC.’S REQUEST FOR
 BROWER LAW GROUP

25201 La Paz Road, Suite 202
 Laguna Hills, California 92653
 Telephone: (949) 668-0825

1 Therefore, Glacier Northwest respectfully requests that this Court take
2 judicial notice of the documents attached as Exhibits 6 through 8.

3 DATED: December 10, 2018

4 BROWER LAW GROUP
A Professional Corporation

5
6 By: /s/ Steven Brower
7 STEVEN BROWER
8 California SBN: 93568
25201 La Paz Road, Suite 202
Laguna Hills, CA 92653
9 Telephone: (949) 668-0825
Email: Steve@BrowerLawGroup.com
Attorneys for Plaintiff Pro Hac Vice

10
11 MONTGOMERY PURDUE
12 BLANKINSHIP & AUSTIN PLLC

13 By: s/ Christopher M. Reed
14 Andrew R. Chisholm
15 WA State Bar No. 30673
Christopher M. Reed
16 WA State Bar No. 49716
701 Fifth Avenue, Suite 5500
Seattle, WA 98104
17 Telephone: (206) 682-7090
Email: achisholm@mpba.com
18 Email: creed@mpba.com
Fax: (206) 625-9534
Attorneys for Plaintiff – Local Counsel

19
20
21
22
23
24
25
26
27 {18117/052/01823024-1}

GLACIER NORTHWEST, INC.'S REQUEST FOR
BROWER LAW GROUP

JUDICIAL NOTICE ISO OPPOSITION TO MOTION
TO DISMISS
2:18-cv-00556 TSZ

25201 La Paz Road, Suite 202
Laguna Hills, California 92653
Telephone: (949) 668-0825

EXHIBIT 6

LILLIS PITHA LLP

Damien P. Lillis (SB# 191258)
 dlillis@lp-lawyers.com
 Martin L. Pitha (SB# 192447)
 mpitha@lp-lawyers.com
 465 California Street, 5th Floor
 San Francisco, California 94104
 Telephone: (415) 814-0405
 Facsimile: (415) 217-7011

BRACEWELL LLP

Jared D. Schuettenhelm (SB# 267885)
 jared.schuettenhelm@bracewell.com
 701 Fifth Avenue, Suite 6200
 Seattle, Washington 98104-7018
 Telephone: (206) 204-6200
 Facsimile: (800) 404-3970

*Attorneys for Cross-Defendant
 Cementaid International Marketing, Ltd.
 erroneously sued herein as Cementaid
 International Group*

ELECTRONICALLY

FILED

*Superior Court of California,
 County of San Francisco*

07/13/2018

Clerk of the Court

BY:EDNALEEN ALEGRE

Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

MILLENNIUM TOWER ASSOCIATION, a
 California nonprofit mutual benefit corporation,

Plaintiff,

vs.

MISSION STREET DEVELOPMENT LLC, a
 Delaware Limited Liability Company; et al.,

Defendants.

WEBCOR CONSTRUCTION LP, d/b/a
 WEBCOR BUILDERS, survivor to a merger with
 WEBCOR CONSTRUCTION, INC.,

Cross-Complainant,

vs.

AMERICAN PILEDIVING, INC., a California
 corporation; CEMENTAID INTERNATIONAL
 GROUP, an unknown entity; CENTRAL
 CONCRETE SUPPLY CO., INC., a Texas

Case No. CGC-17-557830

NOTICE OF APPEARANCE

Action Filed: 3/29/2017

Trial Date: N/A

1 corporation; ENCLOS CORP, a Minnesota
2 corporation; GLACIER NORTHWEST, INC., a
3 Washington corporation; PACIFIC STATES
4 ENVIRONMENTAL CONTRACTORS, INC., a
5 California corporation; VIKING DRILLERS,
6 INC., a California corporation; YKK-APP, Inc., a
7 Japanese corporation; and ROES I through 100,

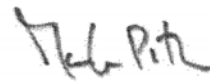
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Cross-Defendants.

TO THE COURT, AND ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT Cementaid International Marketing, Ltd. ("Cementaid") erroneously sued herein as Cementaid International Group is represented by the law firms of Lillis Pitha LLP and Bracewell LLP in this action. This Notice of Appearance is for the limited purpose of identifying counsel and is without prejudice to Cementaid's right to challenge any Complaint(s) and/or Cross-Complaint(s) filed against it, to raise any affirmative defense in its responsive pleading(s), or any other procedural or substantive rights it may have.

Dated: July 13, 2018

LILLIS PITHA LLP



By: _____

Martin L. Pitha

BRACEWELL LLP

Jared D. Schuettenhelm

Attorneys for Cross-Defendant
Cementaid International Marketing Ltd.
(erroneously sued herein as Cementaid
International Group)

PROOF OF SERVICE

I, Martin L. Pitha, declare:

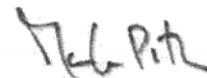
I am a citizen of the United States and a partner in the law firm of Lillis Pitha LLP. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2 Park Plaza, Suite 480, Irvine, California 92614. On the date set forth below, I served a copy of the within document(s):

NOTICE OF APPEARANCE

- ☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail in Irvine, California, addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below, or causing the document(s) to be so delivered.
- ☐ by transmitting via e-mail the document(s) listed above to the e-mail address(es) set forth below on this date before 5:00 p.m.
- ☒ by causing such documents to be served on the interested parties to this action as designated on the Transaction Receipt by submitting an electronic version of the documents via File & ServeXpress website. (as to attached service list)

*Attached service list
(via File & ServeXpress)*

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on July 13, 2018, in Irvine, California.


Martin L. Pitha

SERVICE LIST

<p>Peter C. Meier Sean D. Unger Sophie J. Sung PAUL HASTINGS LLP 101 California Street, 48th Floor San Francisco, CA 94111</p> <p>Telephone: (415) 856-7000 Facsimile: (415) 856-7100 petermeier@paulhastings.com seanunger@paulhastings.com sophiesung@paulhastings.com</p> <p>William F. Sullivan D. Scott Carlton PAUL HASTINGS LLP 515 S. Flower Street Twenty-Fifth Floor Los Angeles, CA 90071</p> <p>Telephone: (213) 683-6000 Facsimile: (213) 627-0705 williamsullivan@paulhastings.com scottcarlton@paulhastings.com</p> <p><i>Attorneys for Defendants Mission Street Development LLC; Mission Street Holdings LLC; Millennium Partners Management LLC; Millennium Partners LLC; Millennium Partners I Inc.; MP Marketing of California, Inc.; Christopher M. Jeffries; Philip E. Aarons; Philip H. Lovett; Sean Jeffries; John Luciano; Stephanie Kay; Richard Baumert; and Steven M Hood</i></p>	<p>David B. Casselman David Polinsky Kirk S. Corner CASSELMAN LAW GROUP 5567 Reseda Boulevard, Suite 330 Tarzana, CA 91356</p> <p>Telephone: (818) 609-2300 Facsimile: (818) 345-0162 dbc@casselmanlawgroup.com dp@casselmanlawgroup.com ksc@casselmanlawgroup.com</p> <p><i>Attorneys for Plaintiffs Laura S. Lehman, et al.</i></p>
--	---

<p> Dennis J. Herrera, City Attorney Elaine M. O'Neil, Deputy City Attorney Richard E. Robinson, Deputy City Attorney Kristine A. Poplawski, Deputy City Attorney Ari Baruth, Deputy City Attorney Anne S. Johnson, Deputy City Attorney Erin Bernstein, Deputy City Attorney OFFICE OF THE CITY ATTORNEY Fox Plaza 1390 Market Street, Suite 425 San Francisco, CA 94102-5408 Telephone: (415) 554-3954 Facsimile: (415) 255-0733 richard.e.robinson@sfgov.org kristincpoplawski@sfcityatty.org Ari.Bartuh@sfcityatty.org <i>Attorneys for Defendant City and County of San Francisco; Department of Building Inspection</i> </p>	<p> Michael K. DeChiara Michael J. Vrdaro Louis J. Dennis Mathew C. Dials ZETLIN & De CHIARA LLP 801 Second Avenue New York, NY 10017 Telephone: (212) 682-6800 Facsimile: (212) 682-6861 mkd@zdlaw.com mvardaro@zdlaw.com ldennis@zdlaw.com mdials@zdlaw.com <i>Attorneys for Cross-Defendants Handel Architects, LLP and DeSimone Consulting Engineers, LLC</i> </p>
<p> Robert J. Buccieri FURUKAWA BUCCIERI LLP 800 Airport Boulevard, Suite 504 Burlingame, CA 94010 Telephone: (415) 510-2222 Facsimile: (415) 510-2240 rob@fubulaw.com <i>Attorneys for Attorneys for Cross-Defendants Handel Architects, LLP and DeSimone Consulting Engineers, LLC</i> </p>	<p> Andrew G. Giacomini Miles C. Holden Kaylen Kadotani HANSON BRIDGETT LLP 425 Market Street, 26th Floor San Francisco, CA 94105 Telephone: (415) 777-3200 Facsimile: (415) 541-9366 agiacomini@hansonbridgett.com mholden@hansonbridgett.com Idcadotani@hansonbridgett.com <i>Attorneys for Cross-Defendant Treadwell & Rollo, Inc. and T&R Consolidated</i> </p>

<p> Mark Hartney George T. McDonnell Rachel Sanders ALLEN MATKINS LECK GAMBLE & MALLORY LLP 865 S. Figueroa Street, Suite 2800 Los Angeles, CA 90017 Telephone: (213) 622-5555 Facsimile: (213) 620-8816 mhartney@allenmatkins.com tmcdonnell@allenmatkins.com rsanders@allenmatkins.com <i>Attorneys for Cross-Defendant Transbay Tower LLC and Boston Properties Inc.</i> </p>	<p> Christine E. Drage Jihan Murad S. Bradley Hart WEIL & DRAGE APC 23212 Mill Creek Drive Laguna Hills, CA 92653 Telephone: (949) 387-8200 (ext. 310) cdrage@weildrage.com jmurad@weildrage.com bhart@weildrage.com <i>Attorneys for Defendant Arup North America Ltd.</i> </p>
<p> Daniel F. McLennon Craig Wallace SMITH CURRIE & HANCOCK LLP 1275 Battery Street, Suite 1300 San Francisco, CA 94111 Telephone: (415) 394-6688 dfmclennon@smithcurrie.com cwwallace@smithcurrie.com <i>Attorney for Cross-Defendant Shimmick/Nicholson JV; Shimmick-Nicholson Construction</i> </p>	<p> Nathan D. Sinning Coral Lopez Jacob Dean ALSTON & BIRD 333 South Hope Street 16th Floor Los Angeles, CA 90071-3004 Telephone: (213) 576-1000 Facsimile: (213) 576-1100 nathan.sinning@alston.com coral.lopez@alston.com jake.dean@alston.com <i>Attorneys for Cross-Defendant YKK AP Inc.</i> </p>
<p> Clark T. Thiel PILLSBURY WINTHROP SHAW PITTMAN LLP Four Embarcadero Center, 22nd Floor San Francisco, CA 94111-5998 Telephone: (415) 983-1000 Facsimile: (415) 983-1200 clark.thiel@pillsburylaw.com <i>Attorneys for Defendant Clark Construction Group LLC; Attorneys for Cross-Defendant Clark/Hathaway Dinwiddie, a joint venture</i> </p>	<p> John Kortum ARCHER NORRIS 2033 North Main Street, Suite 800 Walnut Creek, CA 94596 Telephone: 925.930.6600 Facsimile: 925.930.6620 jkortum@archernorris.com <i>Attorneys for Cross-Defendant Clark Construction Group LLC; Attorneys for Cross-Defendant Clark/Hathaway Dinwiddie, a joint venture</i> </p>

<p>Glenn T. Barger CHAPMAN GLUCKSMAN DEAN ROEB & BARGER 1900 W. Olympic Boulevard Los Angeles, CA 90064</p> <p>Telephone: (310) 207-7722 gbarger@cgdrblaw.com</p> <p><i>Attorneys for Cross-Defendants DND Construction and DMD Construction, J. V.</i></p>	<p>Traci S. Lagasse ANDREWS LAGASSE BRANCH + BELL LLP 626 Wilshire Boulevard, Suite 1000 Los Angeles, CA 90017</p> <p>Telephone: (213) 793-4266 Facsimile: (213) 793-5072 tlagasse@albblaw.com</p> <p><i>Attorneys for Cross-Defendant Curtain Wall Design and Consulting, Inc.</i></p>
<p>David W. Smiley Derek J. Onysko FINCH, THORTON & BAIRD, LLP 4747 Executive Drive-Suite 700 San Diego, CA 92121-3107</p> <p>Telephone: (858) 737-3100 dsmiley@ftblaw.com donysko@ftblaw.com</p> <p><i>Attorneys for Cross Defendant Balfour Beatty Infrastructure, Inc.</i></p>	<p>Steven M. Cvitanovic Renata L. Hoddinott Omar Parra HAIGHT BROWN & BONESTEEL LLP Three Embarcadero Center, Suite 200 San Francisco, CA 94111</p> <p>Telephone: (415) 546-7500 Facsimile: (415) 546-7505 scvitanovic@hbblaw.com rhoddinott@hbblaw.com</p> <p><i>Attorneys for Cross-Defendant Webcor- Obayashi joint venture</i></p>
<p>Steven H. Schwartz Noel E. Macaulay SCHWARTZ & JANZEN LLP 12100 Wilshire Boulevard, Suite 1125 Los Angeles, CA 90025</p> <p>Telephone: (310) 979-4090 sschwartz@sj-law.com nmacaulay@sj-law.com</p> <p><i>Attorneys for Cross-Defendants Treadwell & Rollo, Inc.; T & R Consolidated</i></p>	<p>Russell F. Sauer, Jr. Amy C. Quartarolo Justine M. Wallace LATHAM & WATKINS LLP 355 South Grand Avenue, Suite 100 Los Angeles, CA 90071-1560</p> <p>Telephone: (213) 485-1234 Facsimile: (213) 891-8763 russ.sauer@lw.com amy.quartarolo@lw.com justine.wallace@lw.com</p> <p><i>Attorneys for Cross-Defendants Kilroy Realty Corporation, Kilroy Services LLC and KR 350 Mission LLC</i></p>

<p>Matthew T. Hawk William J. Peters Douglas J. Cefali GORDON & REES SCULLY MANSUKHANI LLP 275 Battery Street, Suite 2000 San Francisco, CA 94111</p> <p>Telephone: (415) 875-3143 mhawk@grsm.com wpeters@grsm.com dcefali@grsm.com</p> <p><i>Attorneys for Defendant Webcor Construction LP, dba Webcor Builders, survivor to a merger with Webcor Construction, Inc.; Webcor Construction, Inc.</i></p>	<p>Cynthia Shambaugh LAW OFFICES OF THOMAS J. BURNS 1525 Market Street, Suite 2900 San Francisco, CA 94105</p> <p>Telephone: (415) 227-2300 cynthia.shambaugh@zurichna.com</p> <p><i>Attorneys for Cross-Defendant Drill Tech Drilling & Shoring, Inc.</i></p>
<p>Alexander J. Chen CHEN, HORWITZ & FRANKLIN 12655 West Jefferson Boulevard, 40th Floor</p> <p>Los Angeles, CA 90066 Telephone: (424) 320-8420 Facsimile: (424) 320-8430 alex@chflaw.com</p> <p><i>Attorneys for Defendant Mission Street Development, LLC</i></p>	<p>Charles A. Patrizia PAUL HASTINGS LLP 875 15th Street, N.W. Washington, DC 20005</p> <p>charlespatrizia@paulhastings.com</p> <p><i>Attorneys for Defendants Millennium Partners Management LLC, Mission Street Development, LLC, Millennium Partners I, Inc., Mission Street Holdings LLC, Millennium Partners LLC, Sean Jeffries, and John Luciano, Philip Aarons, Christopher Jeffries; Sean Jeffries</i></p>
<p>John B. Quinn Steven G. Madison Jacob H. Polin QUINN EMANUEL URQUHART & SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, CA 94111</p> <p>Telephone: (415) 875-6600 Facsimile: (415) 875-6700 johnquinn@quinnemanuel.com stevenmadison@quinnemanuel.com jacobpolin@quinnemanuel.com</p> <p><i>Attorneys for Cross-Defendant Langan Engineering and Environmental Services, Inc.</i></p>	<p>Nomi L. Castle Mark Wendorff CASTLE & ASSOCIATES 8383 Wilshire Boulevard, Suite 810, Beverly Hills, CA 90211</p> <p>Telephone: (310) 286-3400 Facsimile: (310) 286-3400 ext. 407 ncastle@castlelawoffice.com mwendorff@castlelawoffice.com</p> <p><i>Attorneys for Cross-Defendant BECHO, INC., a Utah corporation</i></p>

<p>David A. Ericksen, Esq. Johanna M. Berta, Esq. SEVERSON & WERSON One Embarcadero Center, Suite 2600 San Francisco, CA 94111</p> <p>Telephone: (415) 398-3344 Facsimile: (415) 956-0439 dae@severson.com jmb@severson.com</p> <p><i>Attorneys for Cross-Defendant Langan Engineering and Environmental Services, Inc.</i></p>	<p>Alexander M. Weyand Eric C. Shaw WEYAND LAW FIRM, APC 2490 Mariner Square Loop, Suite 213 Alameda, CA 94501</p> <p>Telephone: (415) 536-2800 Facsimile: (415) 358-4461 awayand@vvylnlaw.com eshaw@wynlaw.com</p> <p><i>Attorneys for Plaintiff Properties GB7, LLC</i></p>
<p>Clement L. Glynn Andrew T. Mortl Adam M. Rapp GLYNN & FINLEY, LLP One Walnut Creek Center 100 Pringle Avenue, Suite 500 Walnut Creek, CA 94596</p> <p>Telephone: (925) 210-2800 Facsimile: (925) 945-1975 cglynn@glynnfinley.com amortl@glynnfinley.com arapp@glynnfinley.com</p> <p><i>Attorneys for Defendants Philip E. Aarons and Philip H. Lovett</i></p>	<p>Jennifer K. Stinnett Ronald R. Roundy CHRISTENSEN HSU SIPES LLP 2485 Natomas Park Drive, Suite 315 Sacramento, CA 95833</p> <p>Telephone: (916) 443-6909 Facsimile: (916) 313-0645 jennifer@chs.law ronald@chs.law</p> <p><i>Attorneys for Cross-Defendant Drill Tech Drilling & Shoring, Inc.</i></p>

John W. Busby
 Ralph A. Zappala
 Laura K. Swanson
 BUSBY ZAPPALA & SANCHEZ LLP
 251 Lafayette Circle, Suite 350
 Lafayette, CA 94549

Telephone: (925) 299-9600
 Facsimile: (925) 299-9608
 jwbusby@bzlawllp.com
 rzappala@bzlawllp.com
 lswanson@bzlawllp.com

Kennett L. Patrick
 WINET PATRICK GAYER CREIGHTON &
 HANES
 1215 West Vista Way
 Vista, CA 92083

Telephone: (760) 758-4261
 Facsimile: (760) 758-6420
 kpatrick@wpgch.com

Attorneys for Cross-Defendant and Cross-Complainant Viking Drillers, Inc.

Michael A. Geibelson
 Jill S. Casselman
 ROBINS KAPLAN LLP
 2049 Century Park East, Suite 3400
 Los Angeles, CA 90067-33208

Telephone: (310) 552-0130
 Facsimile: (310) 229-5800
 mgeibelson@robinskaplan.com
 jcasselman@robinskaplan.com

Attorneys for Plaintiffs Laura S. Lehman, et al.

Keith G. Bremer
 Bryan Stofferahn
 BREMER WHYTE BROWN & O'MEARA LLP
 300 Frank H. Ogawa Plaza, Suite 355
 Oakland, CA 94612

Telephone: (510) 540-4881
 Facsimile: (510) 540-4889
 kbremer@bremerwhyte.com
 bstofferahn@bremerwhyte.com

Attorneys for Cross-Defendant BECHO, INC., a Utah corporation

Denis Shanagher
 DUANE MORRIS LLP
 Spear Tower
 One Market Plaza, Suite 2200
 San Francisco, CA 94105-1127

Telephone: (415) 957-3000
 Facsimile: (415) 957-3001
 dfshanagher@duanemorris.com

Attorneys for Plaintiff Millennium Tower Association

<p>1 Daniel Petrocelli O'MELVENY & MYERS LLP 2 1999 Avenue of the Stars 3 Los Angeles, CA 90067-6035</p> <p>4 Telephone: (310) 553-6700 dpetrocelli@omm.com</p> <p>5 <i>Attorneys for Plaintiff Millennium Tower</i> 6 <i>Association</i></p>	<p>Vision Winter O'MELVENY & MYERS LLP 2765 Sand Hill Road Menlo Park, CA 94025-7019</p> <p>Telephone: (650) 473-2600 vwinter@omm.com</p> <p><i>Attorneys for Plaintiff Millennium Tower</i> <i>Association</i></p>
<p>7 David B. Goodwin COVINGTON & BURLING LLP 8 One Front Street 9 San Francisco, CA 94111-5356</p> <p>10 Telephone: (415) 591-6000 dgoodwin@cov.com</p> <p>11 <i>Attorneys for Defendant Mission Street</i> 12 <i>Development LLC</i></p>	<p>Kenneth F. Strong Ernest M. Isola Brooke H. Anderson GORDON & REES SCULLY MANSUKHANI LLP 275 Battery Street, Suite 2000 San Francisco, CA 94111</p> <p>Telephone: (415) 875-3138 Facsimile: (415) 986-8054 kstrong@gordonrees.com eisola@gordonrees.com banderson@gordonrees.com</p> <p><i>Attorneys for Defendant and Cross-</i> <i>Complainant Langan Engineering and</i> <i>Environmental Services, Inc.</i></p>
<p>17 David Hatem DONOVAN HATEM LLP 18 Exchange Place 19 53 State Street Boston, MA 02109</p> <p>20 Telephone: (617) 406-4800 dhatem@donovanhatem.com</p> <p>21 <i>Attorneys for Defendant Arup North America Ltd.</i></p>	<p>Daniel J. Smith Parris Schmidt BOWMAN AND BROOKE LLP 1741 Technology Drive, Suite 200 San Jose, CA 95110</p> <p>Telephone: (408) 279-5393 daniel.smith@bowmanandbrooke.com parris.schmidt@bowmanandbrooke.com</p> <p><i>Attorneys for Defendants Mission Street</i> <i>Development LLC</i></p>

<p>Diana Dron MONTELEONE & MCCRORY LLP 725 S. Figueroa Street, #3200 Los Angeles, CA 90017</p> <p>Telephone: (213) 612-9900 Facsimile: (213) 612-9930 dron@mmlawyers.com</p> <p><i>Attorneys for Cross-Defendant Glacier Northwest, Inc.</i></p>	<p>Jon B. Zimmerman Gregory B. Cohen MESSNER REEVES LLP 160 West Santa Clara Street, Suite 1000 San Jose, CA 95113</p> <p>Telephone: (408) 298-7120 jzimmerman@messner.com gcohen@messner.com</p> <p><i>Attorneys for Cross-Defendant and Cross-Complainant Central Concrete Supply Co., Inc.</i></p>
<p>Mark D. Petersen Matthew S.L. Cate FARELLA BRAUN + MARTEL LLP 235 Montgomery Street, 17th Floor San Francisco, CA 94104</p> <p>Telephone: (415) 954-4400 Facsimile: (415) 954-4480 mpetersen@fbm.com mcate@fbm.com</p> <p><i>Attorneys for Cross-Defendant Pelli Clarke Pelli Architects, Inc.</i></p>	<p>Bruce W. Lorber Lisa M. Cappelluti Matthew H. Weiner Stephen Poirier Dane Joseph LORBER, GREENFIELD & POLITO, LLP 150 Post Street, Suite 700 San Francisco, CA 94108</p> <p>Telephone: (415) 986-0688 blorber@lorberlaw.com lcappelluti@lorberlaw.com mweiner@lorberlaw.com spoirier@lorberlaw.com djoeph@lorberlaw.com</p> <p><i>Attorneys for Cross-Defendant and Cross-Complainant Level 10 Construction LP</i></p>
<p>Frank M. Pitre Niall P. McCarthy Julie L. Fieber Eric J. Buescher COTCHETT, PITRE & McCARTHY LLP San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010</p> <p>Telephone: (650) 697-6000 fpitre@cpmlegal.com nmccarthy@cpmlegal.com jfieber@cpmlegal.com ebuescher@cpmlegal.com</p> <p><i>Attorneys for Plaintiffs, Pamela Buttery, Trustee of The Pamela Buttery 1990 Trust, et al.</i></p>	<p>Gerald P. Dodson 301 Mission Street, Unit 42E San Francisco, CA 94105</p> <p>Telephone: (415) 658-7686 jerrydodson@gmail.com</p> <p><i>Attorneys for Plaintiffs, Pamela Buttery, Trustee of The Pamela Buttery 1990 Trust, et al.</i></p>

EXHIBIT 7

Bracewell LLP

Philip J. Bezanson
(*pro hac vice* application pending)
Jared D. Schuettenhelm (SB# 267885)
phil.bezanson@bracewell.com
jared.schuettenhelm@bracewell.com
701 Fifth Avenue, Suite 6200
Seattle, Washington 98104-7018
Telephone: (206) 204-6200
Facsimile: (800) 404-3970

Richard F. Whiteley
(*pro hac vice* application pending)
Stacianne M. Wilson
(*pro hac vice* application pending)
richard.whiteley@bracewell.com
staci.wilson@bracewell.com
711 Louisiana Street, Suite 2300
Houston, Texas 77002
Telephone: (713) 221-1123
Facsimile: (800) 404-3970

LILLIS PITHA LLP

Damien P. Lillis (SBN 191258)
dlillis@lp-lawyers.com
Martin L. Pitha (SBN 192447)
mpitha@lp-lawyers.com
350 California Street, 22nd Floor
San Francisco, California 94104
Telephone: (415) 814-0405
Facsimile: (415) 217-7011

*Attorney for Cross Complaint Defendant
CEMENTAID INTERNATIONAL
MARKETING, LTD. ERRONEOUSLY
SUED HEREIN AS CEMENTAID
INTERNATIONAL GROUP*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

MILLENNIUM TOWER ASSOCIATION, a
California nonprofit mutual benefit corporation,

Plaintiff,

vs.

Case No. CGC-17-557830

**MEMORANDUM OF POINTS
AND AUTHORITIES IN SUPPORT
OF CEMENTAID'S JOINDER IN
YKK AP, INC.'S MOTION TO
CONTINUE THE TRIAL DATE
AND MOTION TO SEVER THE**

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CEMENTAID'S
JOINDER IN YKK AP, INC.'S MOTION TO CONTINUE THE TRIAL DATE AND MOTION
TO SEVER THE NON-FOUNDATIONAL DEFECT ISSUES**

MISSION STREET DEVELOPMENT LLC, a
Delaware Limited Liability Company; et al.,

Defendants.

AND ALL RELATED CROSS-ACTIONS.

**NON-FOUNDATIONAL DEFECT
ISSUES**

Date: July 16, 2018

Time: 2:00 p.m.

Dept.: 304

Judge: Hon. Curtis E.A. Karnow

[Notice of Joinder and Declaration of
Jared Schuettenhelm served herewith]

I. INTRODUCTION

Cementaid International Marketing, Ltd. (“Cementaid”) is a Hong Kong-based provider of simple-to-use products that enable concrete designers and users to maximize the performance and durability of their structures by giving their concrete enhanced properties and abilities. Cementaid is taking a highly unusual step by appearing in this case well before its response to the pleadings is required to avoid further prejudice in this litigation. The underlying complaint by Millennium Tower Association (“MTA”) was filed on March 29, 2017. Webcor Construction LP (“Webcor”) filed its original cross-complaint on October 13, 2017. Webcor then filed a First Amended Cross-Complaint (“FACC”) on December 13, 2017. Both the original cross-complaint and the FACC named “Cementaid International Group” as a party, not Cementaid. Webcor attempted to serve “Cementaid International Group” through the Hague Convention; however, service was not effectuated because that entity does not exist. Cementaid only learned that Webcor was attempting to add it as a party to this litigation when a service attempt on “Cementaid International Group” was made in New South Wales, Australia at the address of a different entity called Cementaid NSW Pty Ltd. on or about June 8, 2018.

On or about June 29, 2018, Cementaid agreed to waive the service requirements of the Hague Convention and to accept service of Webcor’s FACC. Cementaid also agreed to respond to the FACC on or before August 3, 2018. Nonetheless, when it learned of the upcoming deposition schedule late last week, Cementaid filed an appearance in this matter on July 13, 2018—three weeks before the agreed upon deadline. Over the last three days, Cementaid and its counsel have been working diligently to learn what they can about this litigation and the underlying facts, and to prepare for the slate of upcoming depositions despite just this morning gaining access to the

documents produced in the case. While it is unclear from Webcor's FACC, Cementaid believes it has been included in this case as part of MTA's non-foundational construction defect claims. And it is Cementaid's understanding that those non-foundational construction defect claims are still being defined, articulated, and investigated.

As set forth in YKK AP, Inc.'s ("YKK AP") moving papers, there is insufficient time to adequately investigate the claims, prepare and file dispositive motions, and prepare for trial, particularly with a discovery cut-off date that is less than two months away and with expert reports due shortly thereafter. Additionally, it would be inefficient to have a trial of both the movement-related foundational issues and the non-building movement claims at the same time. As such, Cementaid hereby joins in YKK AP's Motion to Continue the Trial Date and Motion to Sever the Non-Foundational Defect Issues, and respectfully requests that the Court grant YKK AP's Motions.

II. PERTINENT FACTS

Cementaid will refrain from repeating what is already contained in YKK AP's memorandum of points and authorities, which is incorporated herein by reference.

While Cementaid's investigation is in its infancy, Cementaid does not believe that it was involved in, or supplied any products used in, the construction of the high-rise for the Millennium Tower. Cementaid had a Marketing and Material Supply Agreement with cross-defendant Glacier Northwest, Inc. ("Glacier"), whereby Glacier purchased certain Cementaid products, including Everdure Caltite HPI ("Caltite"), an additive that is mixed with concrete prior to construction. However, Cementaid does not know exactly how or even if its products were used in the Millennium Tower project. Based upon the very limited information it has learned to date, Cementaid believes that Caltite may have been mixed into the concrete used in the construction of the subterranean parking garage that is adjacent to the Millennium Tower high-rise. However, because Cementaid

1 was only recently served, and has not even responded yet to the FACC, Cementaid has not had an
2 opportunity to conduct any discovery to determine the exact allegations against it or analyze any
3 evidence that supports or controverts those allegations. Cementaid also has not had an opportunity
4 to participate in the various discovery conferences or the depositions that have taken place prior to
5 entering its appearance; and it has just received access to the discovery depository and the vast
6 number of documents produced in this case the morning before the hearing on YKK AP's motion.
7

8 **III. YKK AP'S MOTION TO CONTINUE AND CEMENTAID'S JOINDER THEREIN**
9 **SHOULD BE GRANTED TO AFFORD DUE PROCESS TO RECENTLY JOINED**
10 **PARTIES**

11 As set forth in YKK AP's papers, the addition of a new party may constitute good cause for
12 continuing a trial date if the new party has not had a reasonable opportunity to conduct discovery
13 and prepare for trial. (Cal. Rules of Court, Rule 3.1332(c)(5)(A).) When the trial date in this matter
14 was set, Cementaid was not named correctly as a party to, and had not been served with any papers
15 in, this litigation, nor had it otherwise been notified that it was a party to this litigation. Cementaid
16 did not make an appearance in this litigation until three days ago – three weeks earlier than agreed
17 with Webcor. To date, Cementaid has not seen any expert reports or other discovery detailing the
18 extent of Webcor's claims against Cementaid, and Cementaid has not had an opportunity to conduct
19 any discovery to fully investigate the claims pending against it. Like YKK AP, Cementaid is a new
20 party to the instant action, and has not had any opportunity to review the 2.1 terabytes of data
21 deposited in the document depository, thoroughly prepare for the numerous depositions that are
22 expected to take place between now and the time of trial, conduct general and targeted discovery,
23 participate in mediation or any case management conferences, retain experts, or conduct any
24 inspection or testing of any portion of the Millennium Tower. Under the current schedule,
25
26

1 Cementaid has less than two months to conduct this discovery. Cementaid also has an extremely
2 limited window prepare and file dispositive motions and prepare for trial in this matter.

3 Accordingly, denial of a continuance would have the practical effect of depriving Cementaid
4 of a full and fair opportunity to defend itself by denying it sufficient time to conduct discovery and
5 make dispositive motions. As YKK AP noted, the interests of justice will be served by a
6 continuance. Cementaid is not joining this motion because it was dilatory or otherwise failed to
7 prepare this case for trial. To the contrary, the request is made just three days after Cementaid
8 appeared in this action and, as the schedule currently stands, Cementaid has insufficient time to
9 adequately prepare for trial, weigh potential exposure and risks in this matter and effectively
10 represent its interests at trial, and develop its claims against necessary third parties who have yet to
11 be named in this case. In light of the foregoing, the continuance should be granted. (*Cade v. Mid-*
12 *City Hospital Corp.*, (1975) 45 Cal. App.3d 589.)
13

14 **IV. YKK AP'S MOTION TO SEVER AND CEMENTAID'S JOINDER THEREIN**
15 **SHOULD BE GRANTED IN THE INTEREST OF JUDICIAL ECONOMY**

16 As the court is aware, the building foundation/settlement claims are extremely complex and
17 involve not only design and construction issues with respect to the Millennium Tower project, but
18 also design and construction issues involving surrounding properties. At present, Cementaid does
19 not believe it was involved with, and it is unaware of supplying any of its products for, the
20 construction of the Millennium Tower high-rise or the other adjacent properties. Based on the
21 limited information it has been able to glean to date, Cementaid understands that the alleged issues
22 involving Cementaid's product apparently relate only to the subterranean parking garage. It is also
23 Cementaid's understanding that these alleged issues are completely separate and distinct from the
24
25
26
27

1 building foundation/settlement issues. Accordingly, these non-foundational claims should be
2 severed from the foundation/settlement issues.

3 Although some of the principal witnesses may be material to both categories of claims,
4 Cementaid understands that the vast majority of the witnesses are not. Similarly, most, if not all, of
5 the experts will be different. It would be inefficient to have parties involved in the non-foundational
6 claims present for a lengthy trial addressing soils and building foundation/settlement issues, just as
7 it would to have the soils engineers and other foundation/settlement related defendants and cross-
8 defendants present for unrelated issues regarding alleged construction defects. It would be far more
9 efficient (and easier on the juries) to have separate trials of the foundation/settlement issues and the
10 non-foundational construction defect issues. In addition, it is highly unlikely that the amount of
11 time currently set aside for the trial is sufficient to allow all parties involved in both categories of
12 issues to present their cases.
13

14 **V. CONCLUSION**

15 The need for recently added parties to have adequate time to properly investigate and defend
16 against the claims being asserted against them constitutes good cause to continue the trial.
17 Cementaid is entitled to a full and fair opportunity to conduct discovery to defend itself in this
18 litigation. The current schedule will not allow for such discovery, and thus, a continuance should
19 be granted. Additionally, conducting discovery and having a single trial on the
20 foundation/settlement claims, which involve numerous parties not involved in the design and
21 construction of the Millennium Tower, and the unrelated non-foundational construction defect
22 claims, which involve parties having nothing to do with the foundation/settlement issues, would be
23 highly inefficient and prejudicial to the parties only involved in the non-foundational construction
24 defect part of the case. In order to avoid these inefficiencies and potential prejudice, the
25
26
27

1 foundation/settlement claims should be severed from the non-foundational construction defect
2 claims for purposes of both discovery and trial. Cementaid reserves the right to make its own motion
3 for continuance as discovery in this matter progresses and as Cementaid learns more about the
4 claims asserted against it. However, at this time Cementaid joins in YKK AP's Motion for
5 Continuance and Motion to Sever, and respectfully requests that the Court continue the trial of this
6 matter for six-months and that the Court sever the foundation/settlement claims from the non-
7 foundational construction defect claims for the purposes of discovery and trial.
8

9 Dated: July 16, 2018

10 BRACEWELL LLP

11
12
13 By: 

14 Jared D. Schuettenhelm

15 Attorney for Cross Complaint Defendant
16 Cementaid International Marketing, Ltd.
17 erroneously sued herein as Cementaid
18 International Group
19
20
21
22
23
24
25
26
27

EXHIBIT 8

Bracewell LLP

Philip J. Bezanson
 (pro hac vice application pending)
 Jared D. Schuettenhelm (SB# 267885)
 phil.bezanson@bracewell.com
 jared.schuettenhelm@bracewell.com
 701 Fifth Avenue, Suite 6200
 Seattle, Washington 98104-7018
 Telephone: (206) 204-6200
 Facsimile: (800) 404-3970

Richard F. Whiteley
 (pro hac vice application pending)
 Stacianne M. Wilson
 (pro hac vice application pending)
 richard.whiteley@bracewell.com
 staci.wilson@bracewell.com
 711 Louisiana Street, Suite 2300
 Houston, Texas 77002
 Telephone: (713) 221-1123
 Facsimile: (800) 404-3970

LILLIS PITHA LLP

Damien P. Lillis (SBN 191258)
 dlillis@lp-lawyers.com
 Martin L. Pitha (SBN 192447)
 mpitha@lp-lawyers.com
 350 California Street, 22nd Floor
 San Francisco, California 94104
 Telephone: (415) 814-0405
 Facsimile: (415) 217-7011

*Attorney for Cross Complaint Defendant
 Cementaid International Marketing, Ltd.
 erroneously sued herein as Cementaid
 International Group*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SAN FRANCISCO**

MILLENNIUM TOWER ASSOCIATION, a
 California nonprofit mutual benefit corporation,

Plaintiff,

vs.

MISSION STREET DEVELOPMENT LLC, a
 Delaware Limited Liability Company; et al.,

Case No. CGC-17-557830

**DECLARATION OF JARED
 SCHUETTENHELM IN SUPPORT
 OF CEMENTAID'S JOINDER IN
 YKK AP, INC.'S MOTION TO
 CONTINUE THE TRIAL DATE
 AND MOTION TO SEVER THE
 NON-FOUNDATIONAL DEFECT
 ISSUES**

**DECLARATION OF JARED SCHUETTENHELM IN SUPPORT OF CEMENTAID'S
 JOINDER IN YKK AP, INC.'S MOTION TO CONTINUE THE TRIAL DATE AND
 MOTION TO SEVER THE NON-FOUNDATIONAL DEFECT ISSUES**

ELECTRONICALLY
FILED
 Superior Court of California,
 County of San Francisco
07/16/2018
 Clerk of the Court
 BY: ANNA TORRES
 Deputy Clerk

Defendants.

Date: July 16, 2018
Time: 2:00 p.m.
Dept.: 304
Judge: Hon. Curtis E.A. Karnow

AND ALL RELATED CROSS-ACTIONS.

[Notice of Joinder and Memorandum
of Points and Authorities filed and
served herewith]

1 I, Jared Schuettenhelm, declare:

2
3 1. I am an attorney licensed to practice law in the State of California and am an associate
4 at Bracewell LLP, counsel of record for Hong Kong-based cross-defendant Cementaid International
5 Marketing Ltd. (“Cementaid”), incorrectly named as Cementaid International Group, in this action.
6 Except as to those matters expressly stated on information and belief, I make this declaration on the
7 basis of my personal knowledge and, if called as a witness, would be competent to testify to the
8 facts set forth below.
9

10 2. The Millennium Tower Association (“MTA”) filed its complaint in this matter on
11 March 29, 2017. Cementaid was not named as a defendant.

12 3. Webcor Construction LP (“Webcor”) was named as a defendant in MTA’s complaint.
13 Webcor filed a cross-complaint against several cross-defendants on October 13, 2017, and a First
14 Amended Cross-Complaint (“FACC”) on December 13, 2017.

15 4. Webcor’s original cross-complaint and FACC named “Cementaid International
16 Group” as a cross-defendant.

17 5. “Cementaid International Group” is not a legal entity. Webcor attempted to serve the
18 non-existent entity “Cementaid International Group” through the Hague Convention, in New South
19 Wales, Australia, to the address of a different entity called Cementaid NSW Pty Ltd. on or about
20 June 8, 2018.
21

22 6. Although Cementaid was never properly served in Hong Kong with Webcor’s original
23 cross-complaint or the FACC, Cementaid agreed to accept service and to appear in this litigation.

24 7. On or about June 29, 2018, when Cementaid agreed to accept service for the
25 improperly named “Cementaid International Group,” it reached an agreement with Webcor to
26
27

1 respond to Webcor's FACC on or before August 3, 2018. Cementaid then became aware of the
2 extensive upcoming deposition schedule in this matter. Cementaid made its first appearance in this
3 matter on July 13, 2018.

4 8. Upon information and belief, Cementaid's involvement in this matter may involve
5 Cementaid's product, Everdure Caltite HPI ("Caltite"), which may have been used in the
6 construction of the subterranean parking structure that is adjacent to Millennium Tower. Caltite is
7 manufactured in Singapore.

8 9. Cementaid had a Marketing and Material Supply Agreement with cross-defendant
9 Glacier Northwest, Inc. ("Glacier"), whereby Glacier purchased Caltite, an additive that is mixed
10 with concrete prior to construction. Cementaid does not know exactly how or even if its products
11 were used in the Millennium Tower project.

12 10. Cementaid has not had an opportunity to participate in any of the discovery
13 conferences or depositions that have occurred prior to July 16, 2018.

14 11. Cementaid was given access to the discovery depository on Monday, July 16, 2018,
15 but it has not yet been able to review any of the documents contained in the depository. Cementaid
16 has not yet been served with any discovery demands, but it anticipates that any responsive materials
17 will be in Hong Kong, Singapore, or elsewhere abroad. Cementaid does not have offices or facilities
18 in the United States and does not have employees in the United States. Cementaid's witnesses
19 regarding the issues in litigation are therefore abroad, as well.

20 12. Significant additional time is needed to review the documents already produced to the
21 discovery depository and the documents that are being produced on an ongoing basis, to conduct an
22 investigation into the use Cementaid's products in the parking structure, if any, and to conduct
23 discovery necessary to properly evaluate and defend against the claims asserted against Cementaid.
24
25
26
27

1 Significant additional time is also needed to allow Cementaid to prepare and file dispositive motions
2 and to prepare for trial.

3 13. I do not believe that the trial of the foundation/settlement claims and the non-
4 foundational construction defect claims can be completed in the time currently allotted by the Court,
5 which I understand to be January 28, 2018 to March 1, 2019 (5 weeks).

6
7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct.

9
10 Executed on July 16, 2018 at San Francisco, California.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



Jared D. Schuettenhelm

DECLARATION OF SERVICE

I hereby certify that on 10th day of December, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Steven Brower
Brower Law Group
25201 La Paz Road, Suite 202
Laguna Hills, CA 92653
Phone: 949-668-0825
Email: steve@browerlawgroup.com
Pro Hac Vice Attorneys for Plaintiffs

Richard F. Whiteley
Stacianne M. Wilson
Bracewell LLP
711 Louisiana Street, Suite 2300
Houston, TX 77002
Phone: 713-221-1123
Email: Richard.whiteley@bracewell.com
Email: staci.wilson@bracewell.com
Pro Hac Vice Attorneys for Defendant Cementaid International Marketing

Jared D. Schuettenhelm
Philip J. Bezanson
Bracewell LP
701 Fifth Ave., Suite 6200
Seattle, WA 98104
Phone: 206-204-6206
Email: Jared.schuettenhelm@bracewell.com
Email: phil.bezanson@bracewell.com
Attorneys for Defendant Cementaid International Marketing

DATED this 10th day of December, 2018, at Seattle, Washington.

s/Christopher M. Reed
Andrew R. Chisholm
WA State Bar No. 30673
Christopher M. Reed
WA State Bar No. 49716
701 Fifth Avenue, Suite 5500
Seattle, WA 98104
Telephone: (206) 682-7090
Email: achisholm@mpba.com
Email: creed@mpba.com
Fax: (206) 625-9534
Attorneys for Plaintiff – Local Counsel

{18117/052/01823024-1}

GLACIER NORTHWEST, INC.'S REQUEST FOR
BROWER LAW GROUP

JUDICIAL NOTICE ISO OPPOSITION TO MOTION
TO DISMISS
2:18-cv-00556 TSZ

25201 La Paz Road, Suite 202
Laguna Hills, California 92653
Telephone: (949) 668-0825